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James H. Smith

*Counsel for Winners Industry Co., Ltd.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	)	<b>Chapter 11</b>
<b>SEARS HOLDINGS CORPORATION, et al.</b>	)	<b>Case No. 18-23538 (RDD)</b>
<b>Debtors<sup>1</sup></b>	)	<b>Jointly Administered</b>

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**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby appears in the above-captioned proceedings as counsel to Winners Industry Co., Ltd. ("Winners"), and requests, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), and sections 102(1), 342, and 1109(b) of title 11 of the United States Code ("Bankruptcy Code"),

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innoval Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

that all notices given or required to be given in connection with the above-captioned proceedings, and all papers served or required to be served in connection therewith, be given and served upon:

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**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes, without limitation, any and all notices in respect of any pleadings, motions, applications, presentments, petitions, memoranda, affidavits, declarations, and orders, or other documents, filed or entered in these cases.

**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code, but also includes without limitation the schedules, statement of financial affairs, operating reports, pleadings, motions, applications, complaints, demands, hearings, requests or pleadings, and disclosure statement, any letter, objections, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to this proceeding, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronic mail, telephone, or otherwise filed or delivered to the clerk, court or judge in connection with and with regard to these cases and any proceeding related thereto as well as the property of the Debtors.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of Winners to (a) have

final orders in non-core matters entered only after de novo review by a District Court judge, (b) trial by jury in a proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (c) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (d) object to the jurisdiction of the Bankruptcy Court for any purpose, (e) any election of remedy, or (f) any rights, claims, actions and/or defenses, in law, in equity, or otherwise, all of which such rights, claims, actions and/or defenses, are expressly preserved and reserved.

Dated: April 11, 2019

Respectfully submitted,

/s/ James H. Smith  
James H. Smith (SBN 4610853)  
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